

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

The State of Texas  
*ex rel.* ALEX DOE, Relator,

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,  
Inc., Planned Parenthood Gulf Coast, Inc.,  
Planned Parenthood of Greater Texas, Inc.,  
Planned Parenthood South Texas, Inc.,  
Planned Parenthood Cameron County, Inc.,  
Planned Parenthood San Antonio, Inc.,

Defendants.

NO. 2:21-CV-00022-Z

**DECLARATION OF KIM CUSTER**

I, Kim Custer, declare and state as follows:

1. I am currently employed by Planned Parenthood Federation of America, Inc. (“PPFA”) as Executive Vice President and Chief Federation Engagement & Impact Officer. I have served as Executive Vice President since 2015 and as Chief Federation Engagement & Impact Officer since the end of 2021.

2. I am over the age of 18 and have personal knowledge of the matters herein or have acquired such knowledge by personally examining the business records kept in the normal course of business by PPFA. If called upon to testify, I could and would testify to the facts in this declaration.

3. I make this declaration in support of Defendants' Response to the Court's Order to Show Cause. I am familiar with the claims and allegations in the above-captioned case based on my review of the Complaint filed by Relator and the Complaint in Intervention filed by the State of Texas.

4. I understand that ARMS Connect refers to the armsconnect.org website, and that the Center for Affiliated Learning ("CAL") refers to the thecal.org website, both of which are wholly owned and operated by Affiliates Risk Management Services, Inc. ("ARMS"). I further understand that ARMS is registered as a non-profit corporation in the State of New York.

5. PPFA does not own or control ARMS. Nor does PPFA operate, manage, or supervise any aspect of ARMS's business.

6. I understand that ARMS has sole and exclusive control over the documents and other content that it hosts on its platforms, including the ARMS Connect and CAL websites.

7. As an ARMS customer, PPFA only has limited end-user access and rights to the documents and content on the ARMS Connect and CAL websites (*e.g.*, ability to view the documents and content). Based on my review and searches, none of the material on the ARMS Connect and CAL websites involves Medicaid, including Medicaid billing and reimbursements.

8. I understand that, in response to Plaintiffs' discovery requests, PPFA agreed to produce non-privileged documents and communications sent to or received by PPFA's Education Department (which reports to me) involving ARMS Connect and CAL that relate to Texas Medicaid, Louisiana Medicaid, or the Affiliate Defendants' submissions to Medicaid. I further understand that PPFA searched the emails and files of relevant custodians in PPFA's Education Department, and produced any responsive, non-privileged documents on October 28, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on November 11, 2022 in Allentown, Pennsylvania.



Kim Custer